

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LISA MENNINGER,

Plaintiff,

v.

PPD DEVELOPMENT, L.P.,

Defendant.

Civil Action No. 1:19-CV-11441-LTS

**PLAINTIFF'S ASSENTED-TO MOTION FOR EXTENSION OF DEADLINES TO
RESPOND TO DEFENDANT'S POST-TRIAL MOTIONS**

Plaintiff Lisa Menninger hereby moves this Court to extend the deadlines for her responses to Defendant PPD Development, L.P.'s Motion for New Trial, or in the Alternative, Remittitur (ECF No. 179) and Renewed Motion for Judgment as a Matter of Law (ECF Doc. No. 180) by fourteen (14) days, to July 7, 2023. As grounds for this Motion, Plaintiff states as follows:

1. On June 9, 2023, Defendant filed a Motion for New Trial, or in the Alternative, Remittitur (ECF Doc. No. 179) and a Renewed Motion for Judgment as a Matter of Law (ECF Doc. No. 180) (the "Post-Trial Motions") along with a forty-page Combined Memorandum of Law in Support of such motions (ECF Doc. No. 181).
2. Plaintiff's responses to the Post-Trial Motions are currently due June 23, 2023.
3. The Post-Trial Motions raise a large number of issues of law and fact. The trial in this matter extended for 10 days and the evidentiary record includes hundreds of exhibits. For all

of these reasons, Plaintiff requires an additional fourteen (14) days to prepare a complete and thorough response to the Post-Trial Motions.

4. Plaintiff's counsel has conferred with counsel for Defendant and Defendant's counsel has stated that they do not oppose the relief requested herein.

6. The request is made for good cause, and not for purposes of delay, and neither party will be prejudiced by the requested relief.

WHEREFORE, Plaintiff respectfully requests that the Court allow the instant Motion and extend the deadlines for her responses to Defendant's Post-Trial Motions by 14 days, to July 7, 2023.

LISA MENNINGER,
By her attorneys,

/s/ Hampton M. Watson
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Dated: June 22, 2023

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2023 I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Defendants by electronically serving their counsel of record.

/s/ Hampton M. Watson
Hampton M. Watson